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1 Anna Y. Park, SBN 164242  
 Sue J. Noh, SBN 192134  
 2 Elizabeth Esparza-Cervantes, SBN 205412  
 U.S. EQUAL EMPLOYMENT  
 3 OPPORTUNITY COMMISSION  
 255 East Temple Street, 4th Floor  
 4 Los Angeles, CA 90012  
 Telephone: (213) 894-1082  
 5 Facsimile: (213) 894-1301

6 Attorneys for Plaintiff  
 U.S. EQUAL EMPLOYMENT  
 7 OPPORTUNITY COMMISSION

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 9 **UNITED STATES DISTRICT COURT**  
 10 **DISTRICT OF NEVADA**

11 EQUAL EMPLOYMENT  
 12 OPPORTUNITY COMMISSION,

13 Plaintiff,

14 v.

15 CAESARS ENTERTAINMENT,  
 16 INC., d/b/a RENO HILTON, PARK  
 PLACE ENTERTAINMENT  
 17 CORPORATION, d/b/a RENO  
 HILTON and DOES 1 - 10, inclusive,

18 Defendants.  
 19

CASE NO.:

**COMPLAINT- CIVIL RIGHTS  
 EMPLOYMENT  
 DISCRIMINATION**  
 (42 U.S.C. §§ 2000e, *et seq.*)

**JURY TRIAL DEMAND**

CV-N-04-0276-DWH-VPC

20  
 21 **NATURE OF THE ACTION**

22 This is an action under Title VII of the Civil Rights Act of 1964, as  
 23 amended, and Title I of the Civil Rights Act of 1991 to correct unlawful  
 24 employment practices. Plaintiff United States Equal Employment Opportunity  
 25 Commission ("Commission" or "EEOC") alleges that Defendants Caesars  
 26 Entertainment, Inc., d/b/a Reno Hilton, Park Place Entertainment Corporation,  
 27 d/b/a Reno Hilton and Doe Defendants 1-10 (all named and unnamed Defendants  
 28 are collectively referred to as "Defendants") subjected Charging Party Rosa

1 Gonzalez de Moreno ("Ms. Gonzalez de **Moreno**") and a class of other similarly  
2 situated female employees ("class members") to sex harassment. The  
3 Commission further alleges that Defendant **retaliated** against Ms. Gonzalez de  
4 Moreno for complaining about the sex harassment.

#### 5 JURISDICTION AND VENUE

6 1. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 451,  
7 1331, 1337, 1343 and 1345.

8 2. This action is authorized and instituted pursuant to Section 706(f)(1)  
9 and (3) of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §  
10 2000e-5(f)(1) and (3) ("Title VII") and Section 102 of the Civil Rights Act of  
11 1991, 42 U.S.C. § 1981a.

12 3. The employment practices **alleged** to be unlawful were and are now  
13 being committed within the jurisdiction of the United States District Court for the  
14 District of Nevada.

#### 15 PARTIES

16 4. Plaintiff, U.S. Equal Employment Opportunity Commission, is the  
17 federal agency charged with the administration, interpretation and enforcement of  
18 Title VII, and is expressly authorized to bring this action by Section 706(f)(1) and  
19 (3) of Title VII, 42 U.S.C. § 2000e-5(f)(1) and (3).

20 5. At all relevant times, Defendant **Caesars Entertainment, Inc.**, d/b/a  
21 Reno Hilton has continuously been doing business in the State of Nevada, and in  
22 Washoe County. At all relevant times, Defendants have continuously employed  
23 fifteen (15) or more persons.

24 6. At all relevant times, Defendant **Park Place Entertainment**  
25 Corporation, d/b/a Reno Hilton has continuously been doing business in the State  
26 of Nevada, and in Washoe County. At all relevant times, Defendants have  
27 continuously employed fifteen (15) or more persons.

28 ///



1 issued a Letter of Determination finding that Ms. Gonzalez de Moreno and a class  
2 of similarly situated females were subjected to unlawful sex harassment and that  
3 Ms. Gonzalez de Moreno was subjected to retaliation for complaining about sex  
4 harassment in violation of Title VII. All conditions precedent to the institution of  
5 this lawsuit have been fulfilled.

6 12. Since in or about at least 2002, Defendants have engaged in unlawful  
7 employment practices at its Reno, Nevada location, in violation of Section 703(a)  
8 of Title VII, 42 U.S.C. §2000e-2(a)(1) by subjecting Ms. Gonzalez de Moreno  
9 and other similarly situated female employees to sex harassment. The sex  
10 harassment Ms. Gonzalez de Moreno and the other female employees were  
11 subjected to, included but was not limited to, egregious and sometimes violent  
12 sex harassment resulting in physical injury, unwelcome physical touching,  
13 grabbing, forcibly undressing, choking, fondling and rubbing by Defendants'  
14 employees as well as sexually charged, derogatory and/or demeaning comments  
15 and speech and/or conduct by the victim's co-workers and/or supervisors.  
16 Defendants, through their supervisors who witnessed and did nothing and/or  
17 participated in such conduct, ratified the sex harassment.

18 13. When Ms. Gonzalez de Moreno rebuked and/or complained about  
19 the sex harassment, Defendants' supervisors ostracized her and reduced her job  
20 duties resulting in a tangible employment action. Defendants also failed to take  
21 immediate and effective corrective action to prevent the harassment despite  
22 repeated complaints from Ms. Gonzalez de Moreno and/or other female  
23 employees about the harassment.

24 14. The effect of the practice(s) complained of in paragraphs 12 and 13  
25 above has been to deprive Ms. Gonzalez de Moreno and other similarly situated  
26 female employees of equal employment opportunities and otherwise adversely  
27 affect their status as employees because of their sex and because Ms. Gonzalez de  
28 Moreno complained about sex harassment.

1       15. Since in or about at least 2002, Defendants have engaged in unlawful  
2 employment practices at its Reno, Nevada location, in violation of Section 704(a)  
3 of Title VII, 42 U.S.C. § 2000e-3(a) by subjecting Ms. Gonzalez de Moreno to  
4 retaliation for complaining about sex harassment.

5       16. The effect of the practices complained of above in paragraph 15 has  
6 been to deprive Ms. Gonzalez de Moreno of equal employment opportunities and  
7 to otherwise adversely affect her employment status because she engaged in  
8 activity protected under Title VII.

9       17. The unlawful employment practices complained of in paragraphs 12  
10 through 16 above were intentional.

11       18. The unlawful employment practices complained of in paragraphs 12  
12 through 16 above were done with malice or with reckless indifference to the  
13 federally protected rights of Ms. Gonzalez de Moreno and other similarly situated  
14 female employees.

15       19. As a direct and proximate result of the aforesaid acts of Defendants,  
16 Ms. Gonzalez de Moreno and other similarly situated female employees have  
17 each suffered emotional pain, suffering, inconvenience, loss of enjoyment of life,  
18 humiliation, and damages, according to proof.

19       20. As a direct and proximate result of the aforesaid acts of Defendants,  
20 Ms. Gonzalez de Moreno and other similarly situated female employees suffered  
21 a loss of earnings, compensation, benefits, and/or other pecuniary losses in an  
22 amounts according to proof.

23                   PRAYER FOR RELIEF

24       Wherefore, the Commission respectfully requests that this Court:

25       A. Grant a permanent injunction enjoining Defendants, their respective  
26 officers, successors, assigns, agents, alter egos, and/or all persons in active  
27 concert or participation with them, from engaging in any employment practice  
28 which discriminates on the basis of sex and/or constitutes sexual harassment;

1           B.     Grant a permanent injunction enjoining Defendants, their respective  
2 officers, successors, assigns, agents, alter egos, and/or all persons in active  
3 concert or participation with them, from retaliating against any employee who  
4 engages in any protected activity under Title VII;

5           C.     Order Defendants to institute and carry out policies, practices, and  
6 programs which provide equal employment opportunities for women, and which  
7 eradicate the effects of its past and present unlawful employment practices;

8           D.     Order Defendants to make whole Ms. Gonzalez de Moreno and other  
9 similarly situated female employees, by providing appropriate backpay with  
10 prejudgment interest, and front pay in amounts to be determined at trial, and/or  
11 other affirmative relief necessary to eradicate the effects of its unlawful  
12 employment practices;

13          E.     Order Defendants to make whole Ms. Gonzalez de Moreno and other  
14 similarly situated female employees, by providing compensation for past and  
15 future pecuniary losses, including but not limited to losses resulting from out of  
16 pocket expenses, and/or other affirmative relief necessary to eradicate the effects  
17 of its unlawful employment practices;

18          F.     Order Defendants to make whole Ms. Gonzalez de Moreno and other  
19 similarly situated female employees by providing compensation for past and  
20 future non-pecuniary losses resulting from the unlawful practices complained of  
21 in paragraphs 12 through 16 above, including, but not limited to emotional pain,  
22 suffering, inconvenience, loss of enjoyment of life, and humiliation, in amounts to  
23 be determined at trial;

24          G.     Order Defendants to pay Ms. Gonzalez de Moreno and other  
25 similarly situated female employees punitive damages for its malicious and  
26 reckless conduct described in paragraphs 12 through 16 above, in amounts to be  
27 determined at trial;

28     ///



1 H. Grant such further relief as the Court deems necessary and proper in  
2 the public interest; and

3 I. Award the Commission its costs of this action.

4 JURY TRIAL DEMAND

5 The Commission requests a jury trial on all questions of fact raised by its  
6 complaint.

7 Dated: May 27, 2004

Respectfully Submitted,

8 ERIC S. DREIBAND  
General Counsel

9 JAMES LEE,  
Deputy General Counsel

10 GWENDOLYN REAMS  
Associate General Counsel

11 U. S. EQUAL EMPLOYMENT  
12 OPPORTUNITY COMMISSION  
13 1801 "L" Street, N.W.  
14 Washington, D.C. 20507

15 ANNA Y. PARK  
Regional Attorney

16 SUE J. NOH  
Trial Attorney

17 ELIZABETH ESPARZA-CERVANTES  
Trial Attorney

18 U. S. EQUAL EMPLOYMENT  
19 OPPORTUNITY COMMISSION  
20 255 E. Temple Street, 4<sup>th</sup> Floor  
21 Los Angeles, CA 90012

22   
23 BY: \_\_\_\_\_  
24 ANNA Y. PARK  
Regional Attorney

25 Attorneys for Plaintiff U.S. Equal  
26 Employment Opportunity Commission  
27  
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